

1 THE HONORABLE RICARDO S. MARTINEZ  
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5 UNITED STATES DISTRICT COURT  
6 WESTERN DISTRICT OF WASHINGTON  
7 AT SEATTLE

8 JOSEPH SANT, MERTON CHUN,  
9 RONESHA SMITH, and HEATHER  
NICASTRO, individually and on behalf of all  
others similarly situated

10 Plaintiffs,

11 vs.

12 ROCKETREACH LLC,

13 Defendant.

14 Case No. 2:24-cv-1626-RSM

15 STIPULATED MOTION TO EXTEND  
RESPONSE AND REPLY DEADLINES  
PERTAINING TO DEFENDANT'S  
MOTION TO DISMISS, MOTION TO  
STRIKE, AND MOTION TO COMPEL  
ARBITRATION

16 **STIPULATION**

17 WHEREAS, Plaintiffs Joseph Sant, Merton Chun, Ronesha Smith, and Heather Nicastro  
(collectively, "Plaintiffs") filed Case No. 2:24-cv-1626 against RocketReach LLC ("Defendant")  
18 on October 8, 2024;

19 WHEREAS, Defendant was served with Plaintiffs' Complaint on October 23, 2024;

20 WHEREAS, Defendant on December 27, 2024 filed a Motion to Dismiss (ECF No. 18), a  
Motion to Strike Class Allegations (ECF No. 19), and a Motion to Compel Arbitration and Stay  
21 Proceedings (ECF No. 16) (taken together, the "Motions");

22 WHEREAS, Plaintiffs' current deadline to respond to the Motions is February 11, 2025;

23 WHEREAS, Plaintiffs' counsel has numerous interceding briefing deadlines and  
arguments in other matters before February 11, 2025;

24 WHEREAS, Defendant's current deadline to reply to Plaintiffs' anticipated responses is  
25 February 18, 2025;

26  
27 STIPULATED MOTION TO EXTEND RESPONSE AND REPLY  
DEADLINES PERTAINING TO DEFENDANT'S MOTION TO  
DISMISS, MOTION TO STRIKE, AND MOTION TO COMPEL  
ARBITRATION - 1

Case No. 2:24-cv-1626-RSM

HEDIN LLP

1395 Brickell Avenue, Suite 610  
Miami, Florida 33131  
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1           WHEREAS, Defendant's counsel has numerous interceding briefing deadlines in other  
2 matters before February 18, 2025;

3           THEREFORE, Plaintiffs and Defendant hereby STIPULATE AND AGREE to extend the  
4 deadline for Plaintiffs to respond to the Motions to March 13, 2025 and the deadline for Defendant  
5 to reply to Plaintiffs' anticipated responses to April 14, 2025. This stipulation shall not operate  
6 as an admission of any factual allegation or legal conclusion, nor shall it operate as a waiver or  
7 otherwise affect any right, defense, claim or objection by any party.

8           Stipulated to this 21st day of January, 2025.

9  
10          Presented and stipulated to by:

11          NICK MAJOR LAW

12          By: /s/ Nick Major  
13          Nick Major, WSBA #49579  
14          450 Alaskan Way S., #200  
15          Seattle, WA 98104  
16          Email: nick@nickmajorlaw.com  
17          *Attorneys for Plaintiffs*

18          HEDIN LLP

19          By: /s/ Tyler K. Somes  
20          Tyler K. Somes, *Pro Hac Vice*  
21          1100 15<sup>th</sup> St NW, Ste. 04-108  
22          Washington, D.C. 20005  
23          Email: tsomes@hedinllp.com  
24          *Attorneys for Plaintiffs*

25          Stipulated to by:

26          WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

27          By: /s/ Patrick G. Lynch  
28          Patrick G. Lynch, WSBA #53147  
29          520 Pike St., Ste. 2350  
30          Seattle, Washington 98101  
31          Patrick.Lynch@wilsonelser.com  
32          *Attorney for RocketReach LLC.*

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3                   **ORDER**  
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IT IS SO ORDERED.

DATED this \_\_\_\_ day of January, 2025

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HON. RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE